

RE: ESI agreement

Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>

Fri 7/15/2022 8:00 AM

To: Nina Perales <nperales@MALDEF.org>; Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>;

Cc: Kenneth Parreno <Kparreno@MALDEF.org>; timothy.f.mellett@usdoj.gov <timothy.f.mellett@usdoj.gov>; daniel.freeman@usdoj.gov <daniel.freeman@usdoj.gov>; smccaffity@texttrial.com <smccaffity@texttrial.com>; jgonzalez@malc.org <jgonzalez@malc.org>; mark@markgaber.com <mark@markgaber.com>; chad@brazilanddunn.com <chad@brazilanddunn.com>; noor@scsj.org <noor@scsj.org>; allison@southerncoalition.org <allison@southerncoalition.org>; akhanna@elias.law <akhanna@elias.law>; dfox@elias.law <dfox@elias.law>; Robert@notzonlaw.com <Robert@notzonlaw.com>; erosenberg@lawyerscommittee.org <erosenberg@lawyerscommittee.org>; garybledsoe@sbcglobal.net <garybledsoe@sbcglobal.net>; nas@naslegal.com <nas@naslegal.com>; martin.golando@gmail.com <martin.golando@gmail.com>; jasmin.lott@usdoj.gov <jasmin.lott@usdoj.gov>; Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>; Will Thompson <Will.Thompson@oag.texas.gov>; Courtney Corbello <Courtney.Corbello@oag.texas.gov>; Ari Herbert <Ari.Herbert@oag.texas.gov>; Fatima Menendez <fmenendez@MALDEF.org>;

Dear Nina,

That description is accurate to our understanding.

Thank you, Jack

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From: Nina Perales <nperales@MALDEF.org>

Sent: Friday, July 15, 2022 1:01 AM

To: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>

Cc: Kenneth Parreno <Kparreno@MALDEF.org>; timothy.f.mellett@usdoj.gov; daniel.freeman@usdoj.gov; smccaffity@texttrial.com; jgonzalez@malc.org; mark@markgaber.com; chad@brazilanddunn.com; noor@scsj.org; allison@southerncoalition.org; akhanna@elias.law; dfox@elias.law; Robert@notzonlaw.com; erosenberg@lawyerscommittee.org; garybledsoe@sbcglobal.net; nas@naslegal.com; martin.golando@gmail.com; jasmin.lott@usdoj.gov; Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>; Will Thompson <Will.Thompson@oag.texas.gov>; Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>; Courtney Corbello <Courtney.Corbello@oag.texas.gov>; Ari Herbert <Ari.Herbert@oag.texas.gov>; Fatima Menendez <fmenendez@MALDEF.org>

Subject: ESI agreement

Dear Patrick,

Following our concert earlier today, this email memorializes the agreement between Plaintiffs, Defendants and third parties represented by the Office of the Texas Attorney General that following the close of fact discovery on July 15, 2022, the time periods set out in paragraph IX(B)(5) of the ESI order (Dkt. 203) shall control for the production of privilege logs, attempts to resolve discovery disputes and the filing of any motions to compel. Privilege logs may be produced on a rolling basis, but no later than 30 days after each associated production, notwithstanding the close of discovery. The receiving party may, notwithstanding the date of the close of discovery, review and register complaints about said log(s) no later than 30 days after the date of receipt and shall have the right to have those complaints resolved and have any non-privileged documents produced.

Nina Perales

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